



Global Business Trade and Internet

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Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, N.W. - Room 222
Washington, DC 20554

May 13, 1998

Dear Ms. Salas:

I have been trying to discover who is the company that appeared on my phone bill as Online consulting and why they are billing me for services I have never ordered. You proposed changes to publishing information about rates and telephone imposes hardship.

Re: Policy and Rules Concerning the Interstate, Interexchange Marketplace;
Implementation of Section 254 (g) of the Communications Act of 1934, as amended: CC
Docket No. 96-61

On December 4, 1997, the Telecommunications Management Information Systems Coalition and The Utility Reform Network filed a Petition for Further Reconsideration of the Federal Communications Commission's decision to eliminate the requirement for long distance carriers to provide pricing and service information regarding widely available services to the public. [Name of entity] writes to support the Petition.

In October 1996, the FCC adopted rules that prohibit long distance carriers from filing their tariffs for domestic long distance service with the FCC. At the same time, the Commission noted that consumers continue to need information about the rates, terms and conditions of long distance service. As a result, the FCC required carriers to make such information available to the public. In August 1997, the Commission inexplicably changed its position and eliminated the public disclosure requirement for mass market services even though no party requested such a change. Despite the FCC's elimination of the information disclosure requirement, a strong need for publicly available information regarding long distance services remains.

Consumers of long distance services, both residential and small business, rely on publicly available pricing information in order to make informed decisions about the telecommunications services they need. As even the FCC recognized in its October 1996 order, a public disclosure requirement promotes the public interest by making it easier for consumers to compare service offerings. Thousands of long distance calling plans and services are now available to the public. If consumers are to be able to make any meaningful distinctions between these plans, they must have access to detailed and accurate information regarding the plans. The only way to ensure that consumers have access to the plans that they are interested in, as opposed to the particular plan that a carrier happens to be promoting at a particular time, is through an FCC-mandated public disclosure requirement. The FCC should not deny consumers access to this important information.

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Consumers traditionally have served as the FCC's watchdogs over certain practices of the long distance industry. For example, the Communications Act prohibits carriers from charging consumers in rural and other high- cost areas higher rates than those charged to consumers in urban and other lower-cost areas. Absent the public availability of pricing information, however, consumers will be hard pressed to detect such impermissible price discrimination in the first instance. Moreover, even if consumers are able to determine that a violation has occurred, it will be difficult, if not impossible, to adequately support their complaints to the FCC.

The Commission suggests that billing and other advertising and promotional materials will be available to serve the informational needs of consumers. This is far from true. First, billing information, by definition, is only available to a carrier's existing customers and therefore is unavailable to new customers who are comparison shopping and trying to decide between carriers and services. Second, the advertising and promotional materials provided by carriers are rarely detailed enough to enable a customer to make service-to-service and carrier-to-carrier comparisons. Moreover, these materials certainly will not be specific enough to allow consumers to detect--let alone support--a claim of carrier misconduct at the FCC. In short, the information available publicly without a specific Commission requirement will fall far short to meeting consumers' need.

[Entity] thus fully supports the Petition and urges the Commission to promptly reinstate the public information disclosure requirement for widely available services. Only in this way can the Commission ensure that consumers have access to information crucial to both consumer choice and the consumer complaint process.

Very truly yours,

Charles Duff

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